

# **Exhibit B**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
IN RE  
SILVIA NUER  
-----X

CASE No.08-14106 (REG)

---

**RELIEF FROM STAY REAL ESTATE AND  
COOPERATIVE APARTMENTS**

---

I SANELA ALAGIC - Doc Execution Specialist <NAME AND TITLE> OF  
JPMORGAN CHASE BANK NATIONAL ASSOCIATION AS SERVICER FOR DEUTSCHE BANK  
NATIONAL TRUST COMPANY, AS TRUSTEE FOR LONG BEACH MORTGAGE TRUST 2006-2  
(HEREINAFTER, MOVANT ) HEREBY DECLARE (OR CERTIFY, VERIFY, OR STATE):

**BACKGROUND INFORMATION**

1. REAL PROPERTY OR COOPERATIVE APARTMENT ADDRESS WHICH IS THE SUBJECT OF THIS MOTION: 1651 METROPOLITAN AVE. 7C, BRONX, NY 10462
2. LENDER NAME: JPMORGAN CHASE BANK NATIONAL ASSOCIATION AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR LONG BEACH MORTGAGE TRUST 2006-2
3. DATE OF MORTGAGE <MM/DD/YYYY>: 01/06/2006
4. POST-PETITION PAYMENT ADDRESS: 7255 BAYMEADOWS WAY, MAILSTOP JAXB2007, JACKSONVILLE, FL 32256

**DEBT/VALUE REPRESENTATIONS**

5. TOTAL PRE-PETITION AND POST-PETITION INDEBTEDNESS OF DEBTOR(S) TO MOVANT AT THE TIME OF FILING THE MOTION: \$ 114,717.31 GOOD THROUGH 10/24/2008  
(Note: this amount may not to be relied on as a payoff quotation.)
6. MOVANT S ESTIMATED MARKET VALUE OF THE REAL PROPERTY: \$137,000.00
7. SOURCE OF ESTIMATED VALUATION: ONLINE PROPERTY VALUATION

**STATUS OF DEBT AS OF  
THE PETITION DATE**

8. TOTAL PRE-PETITION INDEBTEDNESS OF DEBTOR(S) TO MOVANT AS OF PETITION FILING  
DATE: \$ 114,717.31 GOOD THROUGH 10/24/2008

A. AMOUNT OF PRINCIPAL: \$ 102718.47

B. AMOUNT OF INTEREST: \$ 10,889.12

C. AMOUNT OF ESCROW (taxes and insurance): (\$1,941.73 BALANCE)

D. AMOUNT OF FORCED PLACED INSURANCE EXPENDED BY MOVANT: \$ 0.00

E. AMOUNT OF ATTORNEYS' FEES BILLED TO DEBTOR(S) PRE-PETITION: \$ 1260.00

F. AMOUNT OF PRE-PETITION LATE FEES, IF ANY, BILLED TO DEBTOR(S): \$ 81.45

9. CONTRACTUAL INTEREST RATE: 8.700% ADJUSTABLE RATE WITH CHANGE DATE  
02/01/2008

ORIGINATION TO 01/31/2008: 8.700%

02/01/2008 TO 07/31/2008: 9.875%

08/01/2008 TO PRESENT: 8.875%

(If interest rate is (or was) adjustable, please list the rate(s) and date(s) the rate(s)  
was/were in effect on a separate sheet and attach the sheet as an exhibit to this form;  
please list the exhibit number here: \_\_\_\_.)

10. PLEASE EXPLAIN ANY ADDITIONAL PRE-PETITION FEES, CHARGES OR AMOUNTS  
CHARGED TO DEBTOR S/DEBTORS ACCOUNT AND NOT LISTED ABOVE:

OTHER FEES: \$57.50

FORECLOSURE COSTS: \$1652.50

**AMOUNT OF ALLEGED POST-PETITION DEFAULT  
(AS OF 11/04/2008)**

11. DATE LAST PAYMENT WAS RECEIVED: 09/10/2007 (APPLIED TO 09/01/2007 CONTRACTUAL MONTHLY MORTGAGE PAYMENT)

12. ALLEGED TOTAL NUMBER OF PAYMENTS DUE POST-PETITION FROM FILING OF PETITION THROUGH PAYMENT DUE ON 11/01/2008. AS THIS IS A CHAPTER 7 CASE, THERE ARE NOW A TOTAL OF 14 CONTRACTUAL PAYMENTS NOW DUE.

13. PLEASE LIST ALL POST-PETITION PAYMENTS ALLEGED TO BE IN DEFAULT:

ALLEGED PAYMENT DUE DATE	ALLEGED AMOUNT DUE	AMOUNT RECEIVED	AMOUNT APPLIED TO PRINCIPAL	AMOUNT APPLIED TO INTEREST	AMOUNT APPLIED TO ESCROW	LATE FEE CHARGED (IF ANY)
*10/01/2007	\$899.74					\$16.29
*11/01/2007	\$899.74					\$16.29
*12/01/2007	\$899.74					\$16.29
*01/01/2008	\$899.74					\$16.29
*02/01/2008	\$899.74					\$16.29
*03/01/2008	\$984.96					
*04/01/2008	\$984.96					
*05/01/2008	\$984.96					
*06/01/2008	\$984.96					
*07/01/2008	\$984.96					
*08/01/2008	\$984.96					
*09/01/2008	\$912.46					
*10/01/2008	\$912.46					
11/01/2008	\$912.46					
TOTALS:	\$13,145.84	\$	\$	\$	\$	\$81.45

\* AS THIS IS A CHAPTER 7 CASE, THERE ARE ALSO 13 PRE-PETITION MONTHLY MORTGAGE PAYMENTS NOW DUE AS LISTED ABOVE.

14. AMOUNT OF MOVANT S ATTORNEYS FEES BILLED TO DEBTOR FOR THE PREPARATION, FILING AND PROSECUTION OF THIS MOTION: \$ 650.00

15. AMOUNT OF MOVANT S FILING FEE FOR THIS MOTION: \$ 150.00

16. OTHER ATTORNEYS FEES BILLED TO DEBTOR POST-PETITION: \$ 0.00

17 AMOUNT OF MOVANT S POST-PETITION INSPECTION FEES: \$ 0.00

18. AMOUNT OF MOVANT S POST-PETITION APPRAISAL/BROKER S PRICE OPINION:

\$ 0.00

19. AMOUNT OF FORCED PLACED INSURANCE OR INSURANCE PROVIDED BY THE MOVANT  
POST-PETITION: \$ 0.00

20. SUM HELD IN SUSPENSE BY MOVANT IN CONNECTION WITH THIS CONTRACT, IF  
APPLICABLE: \$ 0.00

21. AMOUNT OF OTHER POST-PETITION ADVANCES OR CHARGES, FOR EXAMPLE TAXES,  
INSURANCE INCURRED BY DEBTOR ETC. : \$ 0.00

## **REQUIRED ATTACHMENTS TO MOTION**

PLEASE ATTACH THE FOLLOWING DOCUMENTS TO THIS MOTION AND INDICATE THE EXHIBIT NUMBER ASSOCIATED WITH THE DOCUMENTS.

- (1) COPIES OF DOCUMENTS THAT INDICATE MOVANT S INTEREST IN THE SUBJECT PROPERTY. FOR PURPOSES OF EXAMPLE ONLY, A COMPLETE AND LEGIBLE COPY OF THE PROMISSORY NOTE OR OTHER DEBT INSTRUMENT TOGETHER WITH A COMPLETE AND LEGIBLE COPY OF THE MORTGAGE AND ANY ASSIGNMENTS IN THE CHAIN FROM THE ORIGINAL MORTGAGEE TO THE CURRENT MOVING PARTY SHOULD BE ATTACHED. (EXHIBIT A.)
- (2) COPIES OF DOCUMENTS ESTABLISHING PROOF OF STANDING TO BRING THIS MOTION. (EXHIBIT A.)
- (3) COPIES OF DOCUMENTS ESTABLISHING MOVANT S INTEREST IN THE REAL PROPERTY OR COOPERATIVE APARTMENT WERE PERFECTED. FOR THE PURPOSES OF EXAMPLE ONLY, A COMPLETE AND LEGIBLE COPY OF THE FINANCING STATEMENT (UCC-1) FILED WITH EITHER THE CLERK S OFFICE OR THE REGISTER OF THE COUNTY THE PROPERTY OR COOPERATIVE APARTMENT IS LOCATED IN. (EXHIBIT A.)

## CERTIFICATION FOR BUSINESS RECORDS

I CERTIFY THAT THE INFORMATION PROVIDED IN THIS WORKSHEET AND/OR ANY EXHIBITS ATTACHED TO THIS WORKSHEET WERE MADE AT OR NEAR THE TIME OF THE OCCURRENCE OF THE MATTERS SET FORTH BY, OR FROM INFORMATION TRANSMITTED BY, A PERSON WITH KNOWLEDGE OF THOSE MATTERS, WERE KEPT IN THE COURSE OF THE REGULARLY CONDUCTED ACTIVITY; AND WERE MADE BY THE REGULARLY CONDUCTED ACTIVITY AS A REGULAR PRACTICE.

I FURTHER CERTIFY THAT COPIES OF ANY TRANSACTIONAL DOCUMENTS ATTACHED TO THIS WORKSHEET AS REQUIRED BY PARAGRAPHS 1, 2 AND 3, IMMEDIATELY ABOVE, ARE TRUE AND ACCURATE COPIES OF THE ORIGINAL DOCUMENTS.

## DECLARATION

I SAPOLA ALAGIC <NAME AND TITLE> OF JPMORGAN CHASE BANK NATIONAL ASSOCIATION AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR LONG BEACH MORTGAGE TRUST 2006-2 HEREBY DECLARE (OR CERTIFY, VERIFY, OR STATE) PURSUANT 28 U.S.C. SECTION 1746 UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT BASED ON PERSONAL KNOWLEDGE OF THE MOVANT S BOOKS AND BUSINESS RECORDS.

EXECUTED AT Jacksonville <CITY/TOWN>, Florida <STATE> ON THIS 10 DAY OF November <MONTH>, 2008 <YEAR>.

 <SIGNATURE>

SAPOLA ALAGIC <PRINT NAME>

Doc Execution Specialist <TITLE>

JPMORGAN CHASE BANK NATIONAL ASSOCIATION AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR LONG BEACH MORTGAGE TRUST 2006-

2

7757 Bayberry Rd <STREET ADDRESS>

JAX-FL- 32256 <CITY, STATE AND ZIP CODE>